



# AmericanCoatings

ASSOCIATION<sup>SM</sup>

June 27, 2017

Angela Ortega  
San Diego County Air Pollution Control District  
10124 Old Grove Road  
San Diego, CA 92131  
Angela.Ortega@sdcounty.ca.gov

**RE: Proposed Revision to Table 1: Exempt Compounds of District Rule 2 –  
Definitions, in accordance with Subsection (b)(21)**

Dear Mrs. Ortega:

The American Coatings Association (ACA) appreciates the opportunity to submit the following comments on San Diego County Air Pollution Control District's (SDAPCD) proposed revision to Table 1: Exempt Compounds in District Rule 2. ACA is a voluntary, nonprofit trade association working to advance the needs of the paint and coatings industry and the professionals who work in it. The organization represents paint and coatings manufacturers, raw materials suppliers, distributors, and technical professionals. ACA serves as an advocate and ally for members on legislative, regulatory and judicial issues, and provides forums for the advancement and promotion of the industry through educational and professional development services

## **CAS Identifiers**

ACA supports SDAPCD's addition of CAS Identifiers to the Table for ease of use and understanding. The CAS Identifiers will allow companies to track chemicals and their exemption status with ease.

## **Adding AMP and tBAC to Table 1**

ACA supports SDAPCD's stated rationale of the revisions to Table 1, which is to exempt compounds that have negligible or very low photochemical reactivity in accordance with decisions made by EPA. Following that rationale, ACA suggests that SDAPCD add 2-amino-2-methyl-1-propanol (AMP) and tert-Butyl acetate (tBAC) to the table of exempt Volatile Organic Compounds (VOCs). These compounds have been determined by EPA to meet the

criteria of negligible or very low photochemical reactivity.<sup>12</sup> The coatings industry is under constant pressure to reformulate products to lower VOC content. Thus, there is a critical and urgent need for safe, effective and affordable exempt compounds like AMP and tBAC.

Thank you for your consideration of our comments. Please feel free to contact us at (202) 462-6272 if you have any questions.

Sincerely,

/s/

Timothy Wieroniey  
Specialist, Health, Safety and Environmental Affairs

*\*\* Sent via email \*\**

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<sup>1</sup> Volume 79, No. 59 FR 17037-17043

<sup>2</sup> Volume 81, No. 37 FR 9339-9342



#### Air Pollution Control Board

Greg Cox	District 1
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July 10, 2017

Timothy Wieroniey  
Specialist, Health, Safety & Environmental Affairs  
American Coatings Association  
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### **RESPONSE TO COMMENTS ON PROPOSED REVISION TO TABLE 1 (EXEMPT COMPOUNDS) OF DISTRICT RULE 2 (DEFINITIONS)**

Thank you for your comments regarding recent amendments to the San Diego County Air Pollution Control District's Rule 2, Table 1 – Exempt Compounds, which identifies compounds that are exempt from volatile organic compound (VOC) regulation. The District appreciates the American Coatings Association's review of the amendments and we value your input.

You suggested adding two compounds to Table 1, specifically 2-amino-2-methyl-1-propanol (AMP) and tert-Butyl acetate (tBAC). Indeed, both compounds were exempted by the U.S. Environmental Protection Agency (EPA) due to their negligible or very low photochemical reactivity (ozone-forming potential).

Importantly, the District regulates VOCs for their toxicity and potential risk to public health as well as their ozone-forming potential. Accordingly, the District does not automatically exempt compounds upon an exemption determination by EPA. We first confirm no toxicity concerns have been raised by California's Office of Environmental Health Hazard Assessment (OEHHA) or another California air district, particularly the South Coast or Bay Area district given their resources and expertise on health effects.

The District will not exempt tBAC or AMP at this time. Other districts have provided only limited exemptions for tBAC due to potential toxicity concerns and OEHHA has not finalized its toxicity report. In regards to AMP, neither the South Coast nor Bay Area district currently provide an exemption for AMP. The District will reconsider these two compounds in the future as Table 1 is reviewed annually.

I can be reached at (858) 586-2753 or [Angela.Ortega@sdcounty.ca.gov](mailto:Angela.Ortega@sdcounty.ca.gov) should you have additional comments.

ANGELA M. ORTEGA  
Rule Development Supervisor

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